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IN THE UNITED STATES BANKRUPTCY COURT District of Utah In the Matter of: Case No. 11-28092 Asuncion Cuevas, Hortencia Cuevas Debtor(s)

MOTION TO MODIFY PLAN PRE-CONFIRMATION

Debtor, through counsel and pursuant to Section 1323, hereby moves the Court for an Order Modifying the proposed Chapter 13 Plan. In support thereof, debtor represents as follows:

- 1. Debtor filed a Chapter 13 petition on June 1, 2011.
- 2. The most recently filed plan is hereby modified as follows:

Section	Previously Filed Plan Provision	Plan as Modified
ба	Debtors shall pay \$ 320.00 per month to the Chapter 13 Trustee until completion of the Plan.	Debtors shall pay \$ 320.00 per month for three months, then \$400.00 per month to the Chapter 13 Trustee until completion of the Plan.

WHEREFORE, Debtor requests that the plan be modified as set forth above.

DATED: September 26, 2011

____/s/___
E. Kent Winward

Abraham Smoot
Attorneys for Debtor